



Nevada Public Radio
1289 S Torrey Pines Drive
Las Vegas, NV 89146

May 27th 2008

Dear FCC Chairman and Commissioners:

In regards the localism proposal I respectfully submit the following in response the proposed rulemaking on behalf of Nevada Public Radio, its governing board of directors, community advisory board members, donors and listeners.

The intent of the proposal is admirable, to compel broadcasters to serve the communities to which they are licensed. However, it is vital to understand the unintended consequence of these proposals on the very broadcasters who have never wavered from the mission of community service: public broadcasters such as Nevada Public Radio.

Nevada Public Radio is locally owned and operated. We have a governing board of directors and a community advisory board. The governing board meets every other month, the community advisory board meets twice annually. Each year the board members contribute hundreds of volunteer hours to ensure our good stewardship of locally donated funds, our regulatory compliance and, critically our adherence to our mission of community service.

We produce more local, high quality news programming than any other broadcast radio outlet in the state of Nevada. 10 hours a week of high quality news programming focused on our region. We are the sole classical music broadcaster in the state.

The service we provide to Nevada and rural areas of Utah, California and Arizona will be no longer be viable if these proposals are adopted. The economics of contemporary broadcasting will simply not allow for local and rural service under the proposed rules.

Thus the proposal will have exactly the reverse effect of its intention. Nevada Public Radio will produce LESS local content and LESS local service, especially to the already underserved rural areas of our coverage map.

ABOUT OUR LOCAL/RURAL SERVICES

Nevada Public Radio operates a non-commercial, radio broadcast network comprised of five stations, KNPR-FM, Las Vegas (88.9), KCNV-FM, Las Vegas (89.7), KTPH-FM Tonopah (91.7), KLNK-FM, Panaca (91.7), KWPR-FM Lund/Ely (88.7), KSGU-FM St. George (90.3), plus five rural translators.

All of our associate stations have populations of less than 5,000 with the exception of the St. George station, which serves a population of approximately 125,000. With mining and military spending on the decline, these communities will never have the financial or human resources to program independently on a 24/7 basis. Nevada Public Radio provides the interconnection, network programming access, engineering maintenance and backup along with insurance, equipment, FCC reporting and centralized management and governance to make rural service to a widely dispersed population a reality.

To improve the quality and reliability of rural signal distribution Nevada Public Radio has completed its transition to satellite and HD technology to interconnect our network of transmitters and translators.

Nevada Public Radio helped to create the first satellite delivery system for HD data. This allows us to create one HD data stream at our Las Vegas headquarters, using one set of Importer/Exporter. The alternative method of purchasing and installing HD data generators at each remote transmitter site would be cost prohibitive. We have completed the conversion of all of our stations both rural and urban to HD digital technology. That allows all of the rural associate stations to carry both the news content of our Las Vegas based KNPR 88.9FM and our classical station KCNV 89.7FM.

Through grant funding from the CPB Digital Conversion Fund our rural audience has the same access to dual public radio service as their urban neighbors in Las Vegas. We would also note the investments made by the federal government that have allowed this service through PTFP grants and CPB monies for which we are very grateful. The proposed rules would render obsolete the valued investments of taxpayer dollars.

To serve the rural residents of southern Nevada and adjacent states, Nevada Public Radio launched an aggressive rural expansion project from 1985 to 1993. Translators extend service to more than 100,000 rural residents within

its 49,000 square miles coverage area, including Beatty, Mesquite, Laughlin and Scotty's Junction, NV, and Death Valley and Ridgecrest, CA, plus Bull Head City and Lake Havasu City, AZ.

In 1993, responding to another unmet need, Nevada Public Radio established the state's first and only Radio Reading Service. This closed-circuit, 24 hour reading service delivers timely, original information totally free of charge to blind and visually-impaired listeners throughout the coverage area. With the cooperation of KUNR-Reno and KNCC-Elko, the service is now available to 98% of the Nevada population. It is also available online.

LOCALLY FOCUSED PROGRAMMING RESPONSIVE TO COMMUNITY NEEDS

Nevada Public Radio produces 10 hours a week of original content. KNPR's State of Nevada is a national award-winning public affairs program supported by a dynamic web site. Launched with a \$500,000 grant from the Corporation for Public Broadcasting, KNPR's SoN has been honored locally and nationally for program excellence including the ACE Award from the Public Radio Program Directors Association. It has attracted additional funding (\$400,000) from the Nevada Community Foundation reflecting the community-oriented content of value to our region.

Our listeners tell us loud and clear they value our mix of national and local news and cultural programming with their financial contributions exceeding \$1.4M in FY 2006-7, and comments such as this:

"I found Las Vegas to be one of the worst places to live until I found NPR, and specifically KNPR's State of Nevada. Your in-depth interviews and attention to all sides of an issue are really exceptional. I tell folks NPR is one of the best things about my time in Las Vegas" - Michele Bonner (original available on request).

As of 2008 independent research shows that the combined Nevada Public Radio weekly audience is approximately 130,000, our website attracts approximately 200,000 visitor sessions each month and more than 200,000 audio downloads of original KNPR content. (documentation available on request). We reach out to our communities through on air, online and print publications that reflect the culture, history, business and political life of our communities.

Each year Nevada Public Radio extends discounts to not for profit underwriters extending their ability to create awareness about cultural

events and social service needs. This exceeds \$500,000 annually in foregone revenue that is a direct community service by Nevada Public Radio.

EFFICIENCIES

By building and operating remote stations that are automated, Nevada Public Radio is able to provide professional, high-quality programming to communities that otherwise could not afford it. At a minimum, it would cost \$250,000 a year to have a local studio with local staff for each station.

$(\$250,000 \times 4 \text{ stations} = \$1,000,000)$

By providing the first ever satellite delivered HD data, the savings are huge. We create one set of 3 HD streams and send them over one satellite channel to all stations. Otherwise it would take 3 analog satellite channels $(\$15,000 \times 3 = \$45,000)$, 3 satellite receivers $(\$5,000 \times 3 \times 5 = \$75,000)$, plus 3 sets of audio processors and Importer/Exporter $(\$35,000 \times 5 \text{ transmitters} = \$175,000)$ for each station.

CONCLUSION

To begin to implement the proposed local origination rules as proposed Nevada Public Radio would need to incur expenses of \$1,295,000 additional to a current budget of \$4.5M.

The only available option to us would be to cease rural broadcasting to the citizens of this region that already have the least choice. That in turn would result in the end of our Radio Reading Service for the blind. It would place pressure on our resources that curtailing remaining locally originated programming may be essential for survival.

Nevada Public Radio has a history of local and rural service, creating award winning valued local programming and serving our community with classical music, a format not viable for commercial broadcasters. Public Radio is a unique partnership between listeners who support with their own direct contributions, local businesses and foundations that underwrite, all of which in turn leverages federal support.

These proposed rules would be a catastrophic burden on the very broadcasters who have devoted their resources to the original intent of community service. We implore you to reject them or provide a complete waiver to non-commercial broadcasters who can demonstrate the level of service we have outlined above.

Respectfully submitted

A handwritten signature in black ink, reading "Florence M E Rogers". The script is fluid and cursive, with the first name "Florence" written in a more compact, stylized manner compared to the last name "Rogers".

Florence M E Rogers
President & General Manager Nevada Public Radio.